

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FEDERAL HOUSING FINANCE AGENCY,
AS CONSERVATOR FOR THE FEDERAL
NATIONAL MORTGAGE ASSOCIATION
AND THE FEDERAL HOME LOAN
MORTGAGE CORPORATION,

Plaintiff,

-against-

NOMURA HOLDING AMERICA, INC.;
NOMURA ASSET ACCEPTANCE
CORPORATION; NOMURA HOME EQUITY
LOAN, INC.; NOMURA CREDIT & CAPITAL,
INC.; NOMURA SECURITIES
INTERNATIONAL, INC.; RBS SECURITIES
INC. (f/k/a GREENWICH CAPITAL MARKETS,
INC.); DAVID FINDLAY; JOHN MCCARTHY;
JOHN P. GRAHAM; NATHAN GORIN; and
DANTE LAROCCA,

Defendants.

Case No. 11 Civ. 6201 (DLC)

**DECLARATION OF CRAIG S. WALDMAN IN SUPPORT OF RBS SECURITIES
INC.'S LOCAL RULE 56.1 COUNTERSTATEMENT OF MATERIAL FACTS AND
REPLY TO PLAINTIFF'S STATEMENT OF UNDISPUTED MATERIAL FACTS**

I, CRAIG S. WALDMAN, make this declaration pursuant to 28 U.S.C. § 1746. I hereby state as follows:

1. I am a member of the law firm Simpson Thacher & Bartlett LLP, counsel to RBS Securities Inc. in the above-captioned matter.
2. I submit this Declaration in support of RBS Securities Inc.'s Local Rule 56.1 Counterstatement of Material Facts and Reply to Plaintiff's Statement of Undisputed Material Facts and to transmit to the Court true and correct copies, to the best of my knowledge, of the documents described below and annexed hereto. I am familiar with the documents

referenced herein based on my personal knowledge, information reported to me by attorneys working under my direction and supervision, and a review of the documents or files maintained by the firm.

3. Attached as RBS Exhibit 1 is a true and correct copy of the MBIA Insurance Corporation's Notice of Deposition of Person Most Knowledgeable to Greenwich Capital Markets, Inc., filed on July 10, 2009 in *MBIA Insurance Corp. v. Bank of America Corp.*

4. Attached as RBS Exhibit 2 are true and correct copies of excerpts from the transcript of the deposition of James Raezer as corporate representative for RBSSI, pursuant to Federal Rule of Civil Procedure 30(b)(6), taken on May 15, 2012 in *MBIA Insurance Corp. v. Bank of America Corp.*

5. Attached as RBS Exhibit 3 are true and correct copies of excerpts from the transcript of the deposition of Robert McGinnis, taken on November 20, 2014.

6. Attached as RBS Exhibit 4 are true and correct copies of excerpts from the transcript of the deposition of Joseph Walsh, taken on April 4, 2014 in *Massachusetts Mutual Life Insurance Company v. RBS Financial Products, Inc.*

7. Attached as RBS Exhibit 5 are true and correct copies of excerpts from the transcript of the deposition of Brian Farrell, taken on October 29-30, 2014.

8. Attached as RBS Exhibit 6 are true and correct copies of excerpts from the transcript of the deposition of James Whittemore, taken on October 16-17, 2014.

9. Attached as RBS Exhibit 7 are true and correct copies of excerpts from the transcript of the deposition of William Gallagher, taken on October 23-24, 2014.

10. Attached as RBS Exhibit 8 is a true and correct copy of an email sent from Dana Pasternak to Brian Farrell and Adam Smith on January 9, 2007, bearing production number

RBS-FHFA-SDNY-0484875.

11. Attached as RBS Exhibit 9 is a true and correct copy of an email sent from Dana Pasternak to Brian Farrell and Adam Smith on January 11, 2007, bearing production number RBS-FHFA-SDNY-0485155.

12. Attached as RBS Exhibit 10 is a true and correct copy of an email sent from Derick Greene to Brian Farrell on January 15, 2007, bearing production number RBS-FHFA-SDNY-0487282.

13. Attached as RBS Exhibit 11 are true and correct copies of excerpts from the transcript of the deposition of Vinu Phillips, taken on November 6, 2014.

14. Attached as RBS Exhibit 12 are true and correct copies of excerpts from the transcript of the deposition of Frank Skibo, taken on October 29-30, 2014.

15. Attached as RBS Exhibit 13 are true and correct copies of excerpts from the transcript of the deposition of Scott Gimpel, taken on October 9-10, 2014.

16. Attached as RBS Exhibit 14 are true and correct copies of excerpts from the transcript of the deposition of Ara Balabanian, taken on May 16, 2014 in *Mutual Life Insurance Company v. RBS Financial Products, Inc.*

17. Attached as RBS Exhibit 15 are true and correct copies of excerpts from the transcript of the deposition of Vinu Phillips, taken on September 20, 2013 in *Federal Home Loan Bank of Seattle v. RBS Securities Inc.*

18. Attached as RBS Exhibit 16 are true and correct copies of excerpts from the transcript of the deposition of James Raezer, taken on April 11, 2013 in *Moneygram Payment Systems, Inc. v. RBS Securities Inc.*

19. Attached as RBS Exhibit 17 are true and correct copies of excerpts from

the transcript of the deposition of Adam Smith, taken on October 21-22, 2014.

20. Attached as RBS Exhibit 18 is a true and correct copy of the Declaration of Stephen W. Bisaillon, executed on December 1, 2014.

21. Attached as RBS Exhibit 19 are true and correct copies of excerpts from the transcript of the deposition of Scott Gimpel, taken on May 16, 2013 in *CMFG Life Insurance Company v. RBS Securities, Inc.*

22. Attached as RBS Exhibit 20 is a true and correct copy of an email sent from Don Lawson to James Whittemore on May 23, 2006, bearing production number RBS-FHFA-CT-7017291, with an attachment of the “semi random” sample size, bearing production number RBS-FHFA-CT-7017292.

23. Attached as RBS Exhibit 21 are true and correct copies of excerpts from the transcript of the deposition of William Gallagher, taken on July 10, 2014 in *Massachusetts Mutual Life Insurance Company v. RBS Financial Products, Inc.*

24. Attached as RBS Exhibit 22 is a true and correct copy of an email sent from Adam Smith to Timothy McLaughlin on September 28, 2006, bearing production number RBS-FHFA-SDNY-0311236.

25. Attached as RBS Exhibit 23 is a true and correct copy of an email sent from James Whittemore to Adam Smith, Brian Farrell, James Esposito, and others on September 28, 2006, bearing production number RBS-FHFA-SDNY-0622262.

26. Attached as RBS Exhibit 24 is a true and correct copy of an email sent from James Whittemore to James Esposito, Adam Smith, Brian Farrell, and others on September 28, 2006, bearing production number RBS-FHFA-SDNY-0622268.

27. Attached as RBS Exhibit 25 are true and correct copies of excerpts from

the transcript of the deposition of James Whittemore, taken on May 30, 2014 in *Massachusetts Mutual Life Insurance Company v. RBS Financial Products, Inc.*

28. Attached as RBS Exhibit 26 is a true and correct copy of a June 2006 RBS Greenwich Capital Credit Department Organizational Chart, bearing production number RBS-FHFA-CT-6353168.

29. Attached as RBS Exhibit 27 are true and correct copies of excerpts from the transcript of the deposition of Frank Camacho, taken on October 9, 2014.

30. Attached as RBS Exhibit 28 are true and correct copies of excerpts from the transcript of the deposition of James Esposito, taken on June 17, 2014 in *Massachusetts Mutual Life Insurance Company v. RBS Financial Products, Inc.*

31. Attached as RBS Exhibit 29 are true and correct copies of excerpts from the transcript of the deposition of Paul Goudie, taken on June 24, 2014 in *Massachusetts Mutual Life Insurance Company v. RBS Financial Products, Inc.*

32. Attached as RBS Exhibit 30 is a true and correct copy of an Excel spreadsheet entitled “RBS Greenwich Capital / ARSI 2006-W5 Event Status – Detail,” bearing production number RBS-FHFA-CT-0274777.

33. Attached as RBS Exhibit 31 is a true and correct copy of the Prospectus Supplement for Argent Securities Trust 2006-W5, bearing production number RBS-FHFA-CT-0147898.

34. Attached as RBS Exhibit 32 is a true and correct copy of an Excel spreadsheet entitled “RBS Greenwich Capital / American Home Loan 2007-3 Security Event Status – Detail,” bearing production number RBS-FHFA-CT-0075232.

35. Attached as RBS Exhibit 33 is a true and correct copy of the Prospectus

Supplement for American Home Mortgage Assets Trust 2007-3, bearing production number RBS-FHFA-CT-0334066.

36. Attached as RBS Exhibit 34 is a true and correct copy of an email sent from Brian Farrell to Adam Smith, James Whittemore, and James Esposito on October 4, 2006, bearing production number RBS-FHFA-SDNY-0622281.

37. Attached as RBS Exhibit 35 is a true and correct copy of an email sent from Daniel Pinero to Brian Farrell on January 26, 2007, bearing production number RBS-FHFA-SDNY-0304153.

38. Attached as RBS Exhibit 36 is a true and correct copy of an email sent from Ara Balabanian to Jeffrey Crusinberry, Michael Koch, Bruce Hurwitz, and others on February 3, 2006, bearing production number RBS-FHFA-CT-4509243.

39. Attached as RBS Exhibit 37 are true and correct copies of excerpts from the transcript of the deposition of Adam Smith, taken on January 29, 2014 in *CMFG Life Insurance Company v. RBS Securities, Inc.*

40. Attached as RBS Exhibit 38 is a true and correct copy of an email sent from Adam Smith to Brian Farrell and James Whittemore on August 9, 2006, bearing production number RBS-FHFA-SDNY-0164304, with an attached spreadsheet entitled "NHELI06-HE3 Due Diligence Summary," bearing production number RBS-FHFA-SDNY-0164309.

41. Attached as RBS Exhibit 39 is a true and correct copy of an email sent from Brian Farrell to Adam Smith on August 9, 2006, bearing production number RBS-FHFA-SDNY-0164310.

42. Attached as RBS Exhibit 40 is a true and correct copy of an email sent from Brian Farrell to Adam Smith on August 9, 2006, bearing production number RBS-FHFA-

SDNY-0161933.

43. Attached as RBS Exhibit 41 is a true and correct copy of an email sent from Adam Smith to Randall Lee on July 31, 2006, bearing production number RBS-FHFA-SDNY-0163010, with attachments relating to questions from collateral analysts on loan tape, bearing production numbers RBS-FHFA-SDNY-0163011 and RBS-FHFA-SDNY-0163012.

44. Attached as RBS Exhibit 42 is a true and correct copy of an email sent from Dana Pasternak to Michael Orfe on August 21, 2006, bearing production number RBS-FHFA-SDNY-0162408, with an attachment containing edits and additional questions from collateral analysts on loan tape, bearing production number RBS-FHFA-SDNY-0489321.

45. Attached as RBS Exhibit 43 is a true and correct copy of an email sent from Steven Katz to Adam Smith on August 10, 2006, bearing production number RBS-FHFA-SDNY-0171295, with an attachment of a presentation entitled "Nomura Securities International Residential Whole Loan Securitization Platform," bearing production number RBS-FHFA-SDNY-0171297.

46. Attached as RBS Exhibit 44 is a true and correct copy of an email sent from Dana Pasternak to Sean Curran and Adam Smith on August 31, 2006, bearing production number RBS-FHFA-SDNY-0158734.

47. Attached as RBS Exhibit 45 is a true and correct copy of an Excel spreadsheet sent from Dana Pasternak to Sean Curran and Adam Smith on August 31, 2006, identifying originators for NHEL1 2006-HE3, bearing production number RBS-FHFA-SDNY-0158736.

48. Attached as RBS Exhibit 46 is a true and correct copy of an email sent from Adam Smith to Brian Farrell on August 9, 2006, bearing production number RBS-FHFA-

SDNY-0161927.

49. Attached as RBS Exhibit 47 is a true and correct copy of an Excel spreadsheet sent from Adam Smith to Brian Farrell on August 9, 2006 with a collateral summary for Nomura 2006-HE3, bearing production number RBS-FHFA-SDNY-0161932.

50. Attached as RBS Exhibit 48 is a true and correct copy of an email sent from Randall Lee to Adam Smith on July 31, 2006, bearing production number RBS-FHFA-SDNY-0162967, with attachments of the loan tape and stratifications for NHELI 2006-HE3, bearing production numbers RBS-FHFA-SDNY-0162971 and RBS-FHFA-SDNY-0162978.

51. Attached as RBS Exhibit 49 is a true and correct copy of an email sent from Peter McMullin to Bruce Gehrlein on February 28, 2007, bearing production number RBS-FHFA-CT-3139529.

52. Attached as RBS Exhibit 50 is a true and correct copy of an Excel spreadsheet sent from Peter McMullin to Bruce Gehrlein on February 28, 2007 entitled "Subprime '06 Risk Report, bearing production numbers RBS-FHFA-CT-3139530.

53. Attached as RBS Exhibit 51 is a true and correct copy of an email sent from Randall Lee to Adam Smith on September 28, 2006, bearing production number RBS-FHFA-SDNY-0400561.

54. Attached as RBS Exhibit 52 is a true and correct copy of an email sent from Mendy Sabo to Brian Farrell and Neil Spagna on September 29, 2006, bearing production number RBS-FHFA-SDNY-0468395.

55. Attached as RBS Exhibit 53 is a true and correct copy of an email sent from Neil Spagna to Mendy Sabo on October 12, 2006, bearing production number NOM-FHFA_04983017, with attachments regarding due diligence performed on NAAC Alternative

Loan Trust Series 2006-AF3 and NHEL 2006-FM2, bearing production numbers NOM-FHFA_04983023 and NOM-FHFA_04983025.

56. Attached as RBS Exhibit 54 is a true and correct copy of a letter sent from Deloitte & Touche LLP to Nomura Securities International, Inc. and Greenwich Capital Markets, Inc. on October 30, 2006, bearing production number SF1FHFA04478508.

57. Attached as RBS Exhibit 55 is a true and correct copy of an email sent from Michael Orfe to Adam Smith on October 11, 2006, bearing production number RBS-FHFA-SDNY-0145677, with an attachment regarding Deloitte's file diligence results, bearing production number RBS-FHFA-SDNY-0145678.

58. Attached as RBS Exhibit 56 is a true and correct copy of an email sent Adam Smith to Erica Sugai, Patrick Leo, Sean Curran, and others on October 2, 2006, bearing production number RBS-FHFA-SDNY-0130648.

59. Attached as RBS Exhibit 57 is a true and correct copy of an email sent from Adam Smith to Polly Barry, Tina Amusso, Zia Dezagon, and others on August 10, 2006, bearing production number RBS-FHFA-SDNY-0167955.

60. Attached as RBS Exhibit 58 is a true and correct copy of the Declaration of Brian Farrell, executed on December 1, 2014.

61. Attached as RBS Exhibit 59 is a true and correct copy of an Excel spreadsheet sent from Adam Smith to Timothy McLaughlin on September 28, 2006 regarding Seller Trade Breakout, bearing production number RBS-FHFA-SDNY-0311238.

62. Attached as RBS Exhibit 60 are true and correct copies of excerpts from the transcript of the deposition of Patrick Leo, taken on May 3, 2014 in *Federal Home Loan Bank of Chicago v. Banc of America Securities LLC, et al.*

63. Attached as RBS Exhibit 61 is a true and correct copy of an email sent from Timothy McLaughlin to Adam Smith on January 19, 2007, bearing production number RBS-FHFA-SDNY-0488802, attaching an Excel spreadsheet regarding overall due diligence on NHELI 2007-AF1, bearing production number RBS-FHFA-SDNY-0488803.

64. Attached as RBS Exhibit 62 is a true and correct copy of an email sent from Michael Orfe to Timothy Crowley and Adam Smith on August 7, 2006, bearing production number RBS-FHFA-SDNY-0162569.

65. Attached as RBS Exhibit 63 is a true and correct copy of an email sent from Adam Smith to Michael Orfe on August 8, 2006, bearing production number RBS-FHFA-SDNY-0162593.

66. Attached as RBS Exhibit 64 is a true and correct copy of a truncated preliminary loan tape for NAA 2007-AR1, listing 1750 loans, bearing production number RBS-FHFA-SDNY-0484894.

67. Attached as RBS Exhibit 65 is a true and correct copy of the Expert Report of Charles D. Cowan, Ph.D. Regarding the Selection of Statistically Valid Random Samples of Mortgage Loans for Fifteen Actions, dated October 10, 2012.

68. Attached as RBS Exhibit 66 is a true and correct copy of Exhibit 2 to the Grice Report, FHFA Exhibit 60.

69. Attached as RBS Exhibit 67 is a true and correct copy of NHEL 2007-AF1 Clayton Due Diligence Summary, dated January 29, 2007, bearing production number RBS-FHFA-SDNY-0487366.

70. Attached as RBS Exhibit 68 are true and correct copies of excerpts from the transcript of the deposition of Brian Farrell, taken on January 15, 2014 in *New Jersey*

Carpenters Vacation Fund, et al., v. The Royal Bank of Scotland Group, PLC, et al.

71. Attached as RBS Exhibit 69 is a true and correct copy of an April 26, 2006 due diligence report regarding an Option One whole loan sale, bearing production number RBS-FHFA-CT-0449949.

72. Attached as RBS Exhibit 70 is a true and correct copy of a September 27, 2005 due diligence report regarding an Option One Securitization, bearing production number RBS-FHFA-CT-2676664.

73. Attached as RBS Exhibit 71 is a true and correct copy of an email sent from Timothy Crowley to Adam Smith, Michael Orfe, Randall Lee, and others on January 11, 2007, bearing production number RBS-FHFA-SDNY-0622574.

74. Attached as RBS Exhibit 72 is a true and correct copy of an Excel spreadsheet attached to FHFA Exhibit 444, bearing production number RBS-FHFA-SDNY-0468385.

75. Attached as RBS Exhibit 73 is a true and correct copy of an email sent from Daniel Pinero to Brian Farrell on January 31, 2007, bearing production number RBS-FHFA-SDNY-0487359, attaching a narrative on NHEL 2007-HE1, bearing production number RBS-FHFA-SDNY-0487360.

76. Attached as RBS Exhibit 74 is a true and correct copy of an email sent from Brian Farrell to James Whittemore, Robert Gargiulo, Matthew Forostoski, and others on October 3, 2006, bearing production number RBS-FHFA-SDNY-0398938.

77. Attached as RBS Exhibit 75 is a true and correct copy of an email sent from William Gallagher to James Whittemore on May 30, 2006, bearing production number RBS-FHFA-CT-4438947.

78. Attached as RBS Exhibit 76 is a true and correct copy of the Expert Report of Lee Kennedy, dated August 14, 2014.

79. Attached as RBS Exhibit 77 are true and correct copies of excerpts from the transcript of the deposition of Vicki Beal as corporate representative for Clayton Holdings, Inc., pursuant to Federal Rule of Civil Procedure 30(b)(6), taken on April 25, 2014.

80. Attached as RBS Exhibit 78 is a true and correct copy of a January 18, 2007 Clayton Individual Asset Summary Report for NAAC 2007-AR1, bearing production number CLAY_FHFA-E-000579403.

81. Attached as RBS Exhibit 79 is a true and correct copy of a January 24, 2007 Clayton Individual Asset Summary Report for NHEL 2007-HE1, bearing production number RBS-FHFA-SDNY-0303667.

82. Attached as RBS Exhibit 80 is a true and correct copy of the Expert Report of Michael Forrester, dated August 14, 2014.

83. Attached as RBS Exhibit 81 is a true and correct copy of the Expert Report of Robert W. Hunter Regarding the Underwriting of Mortgage Loans Underlying the Nomura Securitizations, dated May 15, 2014.

84. Attached as RBS Exhibit 82 are true and correct copies of excerpts from the transcript of the deposition of Brian Farrell, taken on July 16-17, 2014 in *Massachusetts Mutual Life Insurance Company v. RBS Financial Products, Inc.*

85. Attached as RBS Exhibit 83 is a true and correct copy of an Excel spreadsheet attached to FHFA Exhibit 458 entitled "NHEL 2007-HE1 1/1/07 Balances," bearing production number RBS-FHFA-SDNY-0487332.

86. Attached as RBS Exhibit 84 are true and correct copies of excerpts from

the transcript of the deposition of Joseph Walsh, taken on November 21, 2014.

87. Attached as RBS Exhibit 85 is a true and correct copy of the RBS Greenwich Capital, Asset-Backed Finance Manual, dated September 2006, bearing production number RBS-FHFA-CT-6730793.

88. Attached as RBS Exhibit 86 are true and correct copies of excerpts from the transcript of the deposition of Shakti Radhakishun, taken on May 22, 2014 in *Massachusetts Mutual Life Insurance Company v. RBS Financial Products, Inc.*

89. Attached as RBS Exhibit 87 is a true and correct copy of NAAC 2007-AR1 Clayton Due Diligence Summary, dated January 29, 2007, bearing production number RBS-FHFA-SDNY-0487363.

90. Attached as RBS Exhibit 88 is a true and correct copy of NHEL 2007-HE1 Clayton Due Diligence Summary, dated January 29, 2007, bearing production number RBS-FHFA-SDNY-0487360.

91. Attached as RBS Exhibit 89 is a true and correct copy of a letter sent from Deloitte & Touche LLP to Nomura Securities International, Inc. and Greenwich Capital Markets, Inc. on January 26, 2007, bearing production number SF1FHFA04486213.

92. Attached as RBS Exhibit 90 are true and correct copies of excerpts from the transcript of the deposition of Brian Farrell, taken on January 17, 2013 in *CMFG Life Insurance Company v. RBS Securities, Inc.*

93. Attached as RBS Exhibit 91 are true and correct copies of excerpts from the transcript of the deposition of Anne Shera, taken on May 6, 2014 in *Massachusetts Mutual Life Insurance Company v. RBS Financial Products, Inc.*

94. Attached as RBS Exhibit 92 is a true and correct copy of a report entitled

“RBS Greenwich Capital / NHEL 2007-AF1 Event Status – Detail,” dated January 23, 2007, bearing production number RBS-FHFA-SDNY-0000096.

95. Attached as RBS Exhibit 93 is a true and correct copy of a report entitled “RBS Greenwich Capital / NAAC 2007-AR1 Event Status – Detail,” dated January 17, 2007, bearing production number RBS-FHFA-SDNY-0485126.

96. Attached as RBS Exhibit 94 is a true and correct copy of a January 17, 2007 Clayton Individual Asset Summary Report on NAAC 2007-AR1, bearing production number RBS-FHFA-SDNY-0485097.

97. Attached as RBS Exhibit 95 is a true and correct copy of an email sent from Felicia Phillips to Derick Greene and Brian Farrell on January 18, 2007, bearing production number RBS-FHFA-SDNY-0487436.

98. Attached as RBS Exhibit 96 is a true and correct copy of an email sent from Daniel Pinero to Brian Farrell on January 18, 2007, bearing production number CLAY_FHFA-E_000579402.

99. Attached as RBS Exhibit 97 is a true and correct copy of an email sent from Brian Farrell to Daniel Pinero on January 18, 2007, bearing production number RBS-FHFA-SDNY-0487463.

100. Attached as RBS Exhibit 98 is a true and correct copy of a truncated exception detail report for NHEL 2007-HE1, bearing production number RBS-FHFA-SDNY-0303869.

101. Attached as RBS Exhibit 99 is a true and correct copy of a Memorandum regarding Fremont Investment & Loan 2006-3, dated September 20, 2006, bearing production number RBS-FHFA-CT-6943517.

102. Attached as RBS Exhibit 100 is a true and correct copy of the RBS Greenwich Capital Credit Risk Department Monthly Management Report, dated September 2006, bearing production number RBS-FHFA-CT-4072104.

103. Attached as RBS Exhibit 101 are true and correct copies of excerpts from the transcript of the deposition of Paul Goudie, taken on October 16, 2014.

104. Attached as RBS Exhibit 102 is a true and correct copy of a Memorandum regarding Fremont Investment and Loan Seconds Pool Purchase Review, dated September 7, 2005, bearing production number RBS-FHFA-CT-6163687.

105. Attached as RBS Exhibit 103 are true and correct copies of excerpts from the transcript of the deposition of Joan Poccia, taken on January 8, 2014 in *New Jersey Carpenters Vacation Fund, et al., v. The Royal Bank of Scotland Group, PLC, et al.*

106. Attached as RBS Exhibit 104 is a true and correct copy of an Excel spreadsheet entitled “RBS Greenwich Capital / Fremont 2nds 0501 Event Status – Detail,” dated January 28, 2005, bearing production number CLAY-FHFADEF-E-2126065.

107. Attached as RBS Exhibit 105 is a true and correct copy of an email sent from David Stupin to John Barbera, Steve Ross, Anthony Constantine, and others on September 7, 2005, bearing production number RBS-FHFA-CT-4382013.

108. Attached as RBS Exhibit 106 is a true and correct copy of an email sent from Dana Pasternak to Trung Nguyen, Ara Balabanian, Sean Curran and others on September 18, 2006, bearing production number RBS-FHFA-CT-1709330, with an attached Excel spreadsheet bearing production number RBS-FHFA-CT-1709332.

109. Attached as RBS Exhibit 107 is a true and correct copy of an email sent from Brian Farrell to Anne Shera on September 20, 2006, bearing production number RBS-

FHFA-CT-1724638.

110. Attached as RBS Exhibit 108 is a true and correct copy of an Excel spreadsheet attached to RBS Exhibit 107, listing mortgage loans sampled in a Fremont October whole loan trade, bearing production number RBS-FHFA-CT-1724642.

111. Attached as RBS Exhibit 109 is a true and correct copy of an Excel spreadsheet identifying fully underwritten loans in the Fremont 2006-10 pool, bearing production number RBS-FHFA-CT-5611197.

112. Attached as RBS Exhibit 110 is a true and correct copy of an Excel spreadsheet containing the mortgage loan tape for CUSIP FRMNTWL13, bearing production number RBS-FHFA-CT-6537281.

113. Attached as RBS Exhibit 111 is a true and correct copy of an email sent from Adam Smith to Frank Skibo, Patrick Macolino, Peter McMullin and others on July 28, 2006, bearing production number RBS-FHFA-SDNY-0397989.

114. Attached as RBS Exhibit 112 is a true and correct copy of an email sent from Johan Eveland to Adam Smith on July 28, 2006, bearing production number RBS-FHFA-SDNY-0395973.

115. Attached as RBS Exhibit 113 is a true and correct copy of the Prospectus Supplement for First Franklin Mortgage Loan Trust 2006-FF16, bearing production number RBS-FHFA-CT-0953041.

116. Attached as RBS Exhibit 114 is a true and correct copy of an email sent from John Barbera to Grace-Ann Didato on October 13, 2006, bearing production number RBS-FHFA-CT-4511574.

117. Attached as RBS Exhibit 115 is a true and correct copy of the

February 25, 2005 Clayton Individual Asset Summary Report for EquiFirst Whole Loans, bearing production number CLAY-FHFAEF-E-2127087.

118. Attached as RBS Exhibit 116 is a true and correct copy of Plaintiff's Objections and Responses to Defendants' Fourth Set of Interrogatories, dated March 25, 2013.

119. Attached as RBS Exhibit 117 is a true and correct copy of the Expert Report of Kerry D. Vandell, Ph.D., dated July 9, 2014.

120. Attached as RBS Exhibit 118 is a true and correct copy of the 2006 Form 10-K for the Federal National Mortgage Association, or Fannie Mae.

121. Attached as RBS Exhibit 119 is a true and correct copy of the 2006 Annual Report from Freddie Mac.

122. Attached as RBS Exhibit 120 are true and correct copies of excerpts from the transcript of the deposition of James Lockhart, taken on November 20, 2013.

123. Attached as RBS Exhibit 121 is a true and correct copy of the Amended Complaint in *FHFA v. Nomura Holding America Inc., et al.*, dated June 28, 2012.

124. Attached as RBS Exhibit 122 is a true and correct copy of the Freddie Mac Trade Confirmation for NHELI 2006-HE3, bearing production number FHFA00002480.

125. Attached as RBS Exhibit 123 is a true and correct copy of the Freddie Mac Trade Confirmation for NHELI 2006-FM2, bearing production number FHFA01001981.

126. Attached as RBS Exhibit 124 is a true and correct copy of the Freddie Mac Trade Confirmation for NHELI 2007-1, bearing production number FHFA01003626.

127. Attached as RBS Exhibit 125 is a true and correct copy of the Freddie Mac Trade Confirmation for NHELI 2007-HE1, bearing production number FHFA16863753.

128. Attached as RBS Exhibit 126 is a true and correct copy of Defendant RBS

Securities Inc.'s Answer, Defenses, and Affirmative Defenses to Plaintiff's Amended Complaint, dated January 10, 2013.

129. Attached as RBS Exhibit 127 is a true and correct copy of the RBS Greenwich Capital Presentation Regarding RBS Greenwich Capital Whole Loan Acquisition Business, dated May 2006, bearing production number RBS-FHFA-SDNY-0616566.

130. Attached as RBS Exhibit 128 is a true and correct copy of the RBS Greenwich Capital Presentation Regarding RBS Greenwich Capital Whole Loan Acquisition Business, dated November 2006, bearing production number RBS-FHFA-SDNY-0617202.

131. Attached as RBS Exhibit 129 are true and correct copies of excerpts from the transcript of the deposition of Michael McKeever, taken on November 22, 2013 in *In re IndyMac Mortgage-Backed Securities Litigation*.

132. Attached as RBS Exhibit 130 are true and correct copies of excerpts from the transcript of the deposition of Leonard Blum, taken on August 1, 2014 in *Federal Housing Finance Agency, et al., v. Goldman, Sachs & Co., et al.*

133. Attached as RBS Exhibit 131 is a true and correct copy of Thacher Proffitt & Wood LLP's Negative Assurance Letter for NHELI 2006-FM2, dated October 31, 2006, bearing production number SF1FHFA04478377.

134. Attached as RBS Exhibit 132 are true and correct copies of excerpts from the transcript of the deposition of Scott Gimpel, taken on September 4, 2013 in *Federal Home Loan Bank of Seattle v. RBS Securities Inc.*

135. Attached as RBS Exhibit 133 is a true and correct copy of an Excel spreadsheet entitled "NHELI 2007-HE1 Data Integrity Check," bearing production number RBS-FHFA-SDNY-0490113.

136. Attached as RBS Exhibit 134 is a true and correct copy of an email sent from Dana Pasternak to Michael Orfe on January 16, 2007, bearing production number RBS-FHFA-SDNY-0488467.

137. Attached as RBS Exhibit 135 are true and correct copies of excerpts from the transcript of the deposition of Sean Curran, taken on May 15, 2013 in *CMFG Life Insurance Company v. RBS Securities, Inc.*

138. Attached as RBS Exhibit 136 is a true and correct copy of the RBS Greenwich Capital Credit Risk Department Monthly Management Report, dated October 18, 2005, bearing production number RBS-FHFA-SDNY-0576720.

139. Attached as RBS Exhibit 137 is a true and correct copy of a Memorandum regarding Fremont Investment & Loan Whole Loan Purchase, dated December 7, 2004, bearing production number RBS-FHFA-CT-4381790.

140. Attached as RBS Exhibit 138 is a true and correct copy of the RBS Greenwich Capital Credit Risk Department Monthly Management Report, dated June 9, 2005, bearing production number RBS-FHFA-SDNY-0621486.

141. Attached as RBS Exhibit 139 is a true and correct copy of the RBS Greenwich Capital Credit Risk Department Monthly Management Report, dated September 22, 2005, bearing production number RBS-FHFA-SDNY-0545685.

142. Attached as RBS Exhibit 140 is a true and correct copy of a Memorandum regarding EquiFirst – Whole Loan Trade August 2006, bearing production number RBS-FHFA-SDNY-0420355.

143. Attached as RBS Exhibit 141 is a true and correct copy of a Memorandum regarding an EquiFirst Whole Loan Trade from November 2006, bearing production number

RBS-FHFA-SDNY-0420367.

144. Attached as RBS Exhibit 142 is a true and correct copy of a Memorandum regarding EquiFirst Corporation, dated August 17, 2006, bearing production number RBS-FHFA-SDNY-0420436.

145. Attached as RBS Exhibit 143 is a true and correct copy of an email sent from James Whittemore to John Barbera, Joseph Bartolotta, Michael Chung, and others on September 25, 2006, bearing production number RBS-FHFA-SDNY-0420426.

146. Attached as RBS Exhibit 144 is a true and correct copy of an email sent from James Whittemore to John Barbera, Joseph Bartolotta, Michael Chung, and others on October 21, 2006, bearing production number RBS-FHFA-SDNY-0396016.

147. Attached as RBS Exhibit 145 is a true and correct copy of an email sent from David Zimmer to Frank Skibo on September 22, 2005, bearing production number RBS-FHFA-SDNY-0400329.

148. Attached as RBS Exhibit 146 is a true and correct copy of an email sent from Adam Smith to James Whittemore, William Gallagher, Paul Goudie, and others on June 15, 2006, bearing production number RBS-FHFA-SDNY-0397857.

149. Attached as RBS Exhibit 147 is a true and correct copy of a Freddie Mac Alternative Markets Operations Review of Nomura, dated August 31, 2004, bearing production number of FHFA19172000.

150. Attached as RBS Exhibit 148 is a true and correct copy of a Freddie Mac Alternative Markets Operations Review of Nomura, dated March 14, 2006, bearing production number of FHFA13253477.

151. Attached as RBS Exhibit 149 is a true and correct copy of a Freddie Mac

Memorandum on Nomura Credit & Capital, Inc., dated April 4, 2006, bearing production number FHFA00519256.

152. Attached as RBS Exhibit 150 is a true and correct copy of a Freddie Mac Alternative Markets Operations Review of Fremont Investment & Loan, dated February 18-19, 2004, bearing production number of FHFA11596540.

153. Attached as RBS Exhibit 151 is a true and correct copy of a Freddie Mac Alternative Markets Operations Review of Fremont Investment & Loan, dated August 30-31, 2006, bearing production number of FHFA00129493.

154. Attached as RBS Exhibit 152 is a true and correct copy of a Freddie Mac Alternative Markets Operations Review of NovaStar Financial, Inc., dated July 14-15, 2004, bearing production number of FHFA13294962.

155. Attached as RBS Exhibit 153 is a true and correct copy of a Freddie Mac Alternative Markets Operations Review of NovaStar Financial, Inc., dated July 25-26, 2006, bearing production number of FHFA01864567.

156. Attached as RBS Exhibit 154 is a true and correct copy of a Freddie Mac Alternative Markets Operations Review of First NLC Financial Services., dated April 20, 2005, bearing production number of FHFA03484206.

157. Attached as RBS Exhibit 155 is a true and correct copy of the RBS Greenwich Capital Credit Procedures Manual, bearing production number RBS-FHFA-SDNY-0498493.

158. Attached as RBS Exhibit 156 is a true and correct copy of an email sent from Brian Farrell to Derick Greene and Daniel Pinero on January 11, 2007, bearing production number RBS-FHFA-SDNY-0487307.

159. Attached as RBS Exhibit 157 is a true and correct copy of a Memorandum entitled "RBS Greenwich Capital Deal Memo," bearing production number RBS-FHFA-SDNY-0292328.

160. Attached as RBS Exhibit 158 is a true and correct copy of an email sent from Daniel Pinero to Brian Farrell and Derick Greene on January 23, 2007, bearing production number RBS-FHFA-SDNY-0485129, with attached spreadsheets, bearing production numbers RBS-FHFA-SDNY-0485130, RBS-FHFA-SDNY-0485138, RBS-FHFA-SDNY-0485129, RBS-FHFA-SDNY-0485140, and RBS-FHFA-SDNY-0485141.

161. Attached as RBS Exhibit 159 is a true and correct copy of a Freddie Mac Alternative Markets Operations Review of Citigroup Global Markets Inc., dated December 1, 2005, bearing production number FHFA00129460.

162. Attached as RBS Exhibit 160 is a true and correct copy of a Freddie Mac Alternative Markets Operations of Credit Suisse, dated August 14, 2007, bearing production number FHFA00129466.

163. Attached as RBS Exhibit 161 is a true and correct copy of a Freddie Mac Alternative Markets Operations of J.P. Morgan Securities Inc., dated December 7, 2005, bearing production number FHFA00519612.

164. Attached as RBS Exhibit 162 is a true and correct copy of a Freddie Mac Alternative Markets Operations of Société Générale, dated November 30, 2005, bearing production number FHFA00519623.

165. Attached as RBS Exhibit 163 is a true and correct copy of a Freddie Mac Alternative Markets Operations of Merrill Lynch, dated April 21, 2005, bearing production number FHFA01482826.

166. Attached as RBS Exhibit 164 is a true and correct copy of a Freddie Mac Alternative Markets Operations of Deutsche Bank, dated April 30, 2004, bearing production number FHFA11597783.

167. Attached as RBS Exhibit 165 is a true and correct copy of a January 17, 2007 Clayton Individual Asset Summary Report for NHEL 2007-AF1, bearing production number RBS-FHFA-SDNY-0303307.

168. Attached as RBS Exhibit 166 is a true and correct copy of an email sent from Daniel Perino to Brian Farrell and Derick Greene on January 19, 2007, bearing production number RBS-FHFA-SDNY-0484895.

169. Attached as RBS Exhibit 167 is a true and correct copy of an email sent from Daniel Perino to Brian Farrell and Derick Greene on January 19, 2007, bearing production number RBS-FHFA-SDNY-0484879.

170. Attached as RBS Exhibit 168 is a true and correct copy of an email sent from Daniel Perino to Brian Farrell and Derick Greene on January 23, 2007, bearing production number RBS-FHFA-SDNY-0303489.

171. Attached as RBS Exhibit 169 is a true and correct copy of Deloitte's independent report of the Nomura Home Equity Loan Trust, Series 2007-1, Asset-Backed Certificates, Series 2007-1, dated January 26, 2007, bearing production number RBS-FHFA-SDNY-0040874.

172. Attached as RBS Exhibit 170 are true and correct copies of excerpts from the transcript of the deposition of Ronald Feigles, taken on June 12-13, 2013.

173. Attached as RBS Exhibit 171 is a true and correct copy of the Securities and Exchange Commission Release No. 33-9176, 34-63742, dated January 24, 2011.

174. Attached as RBS Exhibit 172 are true and correct copies of excerpts from the transcript of the deposition of Steven A. Campo taken on August 14, 2014.

175. Attached as RBS Exhibit 173 are true and correct copies of excerpts from the transcript of the deposition of Vicki Beal, taken on May 22, 2014.

176. Attached as RBS Exhibit 174 is a true and correct copy of an email sent from Mendy Sabo to Brian Farrell, Daniel Pinero, and Neil Spagna on January 24, 2007, bearing production number RBS-FHFA-SDNY-0487484.

177. Attached as RBS Exhibit 175 is a true and correct copy of an email sent from Randall Lee to Adam Smith on January 23, 2007, bearing production number NOM-FHFA_04921688.

178. Attached as RBS Exhibit 176 is a true and correct copy of an email sent from Katharine Crost to Adam Smith on December 20, 2006, bearing production number RBS-FHFA-SDNY-0488647.

179. Attached as RBS Exhibit 177 is a true and correct copy of an email sent from Dana Pasternak to Brian Farrell on January 16, 2007, bearing production number RBS-FHFA-SDNY-0462953.

180. Attached as RBS Exhibit 178 is a true and correct copy of a January 25, 2007 Clayton Individual Asset Summary Report for NHEL 2007-HE1, bearing production number RBS-FHFA-SDNY-0303898.

181. Attached as RBS Exhibit 179 is a true and correct copy of an Excel spreadsheet containing an exception detail report for NAAC 2007-AR1, bearing production number RBS-FHFA-SDNY-0487374.

182. Attached as RBS Exhibit 180 is a true and correct copy of an Excel

spreadsheet entitled, "NHEL 2007-HE1 Preliminary Pool," bearing production number RBS-FHFA-SDNY-0490112.

183. Attached as RBS Exhibit 181 is a true and correct copy of an Excel spreadsheet entitled, "NHEL 2007-AF1 Data Integrity Check," bearing production number RBS-FHFA-SDNY-0489624.

184. Attached as RBS Exhibit 182 is a true and correct copy of an Excel spreadsheet entitled, "2007-AR1 Prelim Pool Data Integrity Check," bearing production number RBS-FHFA-SDNY-0485835.

185. Attached as RBS Exhibit 183 is a true and correct copy of an Excel spreadsheet entitled, "NHELI 2007-1 Gp II (ARMs) Data Integrity Check," bearing production number RBS-FHFA-SDNY-0489532.

186. Attached as RBS Exhibit 184 is a true and correct copy of an email sent from Adam Smith to Michael Orfe, Steven Katz, Randall Lee, and others on December 20, 2006, bearing production number RBS-FHFA-SDNY-0488654, with an attached Excel spreadsheet bearing production number RBS-FHFA-SDNY-0488655.

187. Attached as RBS Exhibit 185 is a true and correct copy of an email sent from Brian Farrell to Dana Pasternak, Adam Smith, and James Whittemore on January 12, 2007, bearing production number RBS-FHFA-SDNY-0487346.

188. Attached as RBS Exhibit 186 is a true and correct copy of the Nomura Home Equity Loan, Inc. Asset-Backed Securities Underwriting Agreement, dated January 30, 2007, bearing production number MDYS_FHFA 0076864.

189. Attached as RBS Exhibit 187 is a true and correct copy of an email sent from Sean Curran to Adam Smith, Max Jaeger, and Michael McKeever on January 17, 2007,

bearing production number RBS-FHFA-SDNY-0441008, with an attachment bearing production number RBS-FHFA-SDNY-0441009.

190. Attached as RBS Exhibit 188 is a true and correct copy of an email sent from Sean Curran to Mark Bower, Adam Smith, and Michael McKeever on January 17, 2007, bearing production number RBS-FHFA-SDNY-0185458, with an attachment bearing production number RBS-FHFA-SDNY-0185459.

191. Attached as RBS Exhibit 189 is a true and correct copy of an email sent from Sean Curran to Adam Smith, Michael McKeever, Max Jaeger, and others on January 17, 2007, bearing production number RBS-FHFA-SDNY-0186193, with attachments bearing the production numbers RBS-FHFA-SDNY-0186194 and RBS-FHFA-SDNY-0186249.

192. Attached as RBS Exhibit 190 is a true and correct copy of the Free Writing Prospectus for NHELI 2007-1 Group II, bearing production number RBS-FHFA-SDNY-0188587.

193. Attached as RBS Exhibit 191 is a true and correct copy of the Free Writing Prospectus for NHELI 2007-2, bearing production number RBS-FHFA-SDNY-0212713.

194. Attached as RBS Exhibit 192 is a true and correct copy of the Free Writing Prospectus for NHELI 2007-2, bearing production number RBS-FHFA-SDNY-0209415.

195. Attached as RBS Exhibit 193 is a true and correct copy of Thacher Proffitt & Wood LLP's Negative Assurance Letter for NHELI 2007-1, dated January 31, 2007, bearing production number MDYS_FHFA 0073132.

196. Attached as RBS Exhibit 194 is a true and correct copy of Thacher Proffitt & Wood LLP's Negative Assurance Letter for NHELI 2007-2, dated January 31, 2007, bearing production number MDYS_FHFA 0077880.

197. Attached as RBS Exhibit 195 is a true and correct copy of an email sent from Brian Farrell to Neil Spagna on September 28, 2006, bearing production number RBS-FHFA-SDNY-0622191.

198. Attached as RBS Exhibit 196 is a true and correct copy of an Excel spreadsheet entitled "Seller Trade Breakout," bearing production number RBS-FHFA-SDNY-0622193.

199. Attached as RBS Exhibit 197 is a true and correct copy of an Excel spreadsheet, bearing production number RBS-FHFA-SDNY-0622194.

200. Attached as RBS Exhibit 198 is a true and correct copy of an Excel spreadsheet, bearing production number RBS-FHFA-SDNY-0622195.

201. Attached as RBS Exhibit 199 is a true and correct copy of an email sent from Adam Smith to James Whittemore, Brian Farrell, James Esposito, and others on September 28, 2006, bearing production number RBS-FHFA-SDNY-0622186.

202. Attached as RBS Exhibit 200 is a true and correct copy of an email sent from Juliet Buck to Timothy Crowley on October 12, 2006, bearing production number NOM-FHFA_04618948.

203. Attached as RBS Exhibit 201 is a true and correct copy of an email sent from Michael Orfe to Randall Lee and Adam Smith on July 31, 2006, bearing production number RBS-FHFA-SDNY-0163019.

204. Attached as RBS Exhibit 202 is a true and correct copy of an Excel spreadsheet entitled "Nomura 2006-HE3 Final Pool Edits," bearing production number RBS-FHFA-SDNY-0489321.

205. Attached as RBS Exhibit 203 is a true and correct copy of an email sent

from Michael Orfe to Adam Smith on August 8, 2006, bearing production number RBS-FHFA-SDNY-0480409.

206. Attached as RBS Exhibit 204 is a true and correct copy of Thacher Proffitt & Wood LLP's Negative Assurance Letter for NHELI 2006-HE3, dated August 31, 2006, bearing production number MDYS_FHFA 0060766.

207. Attached as RBS Exhibit 205 is a true and correct copy of Deloitte's independent report of the Nomura Home Equity Loan Trust, Series 2006-HE3, dated August 29, 2006, bearing production number MDYS_FHFA 0060760.

208. Attached as RBS Exhibit 206 are true and correct copies of excerpts from the transcript of the deposition of Joseph Paul Norris, taken on July 11, 2013.

209. Attached as RBS Exhibit 207 are true and correct copies of excerpts from the transcript of the deposition of Michael Aneiro, taken on June 6, 2013.

210. Attached as RBS Exhibit 208 are true and correct copies of excerpts from the transcript of the deposition of Lin Cao, taken on May 15, 2013.

211. Attached as RBS Exhibit 209 are true and correct copies of excerpts from the transcript of the deposition of Perri Henderson, taken on November 6, 2013.

212. Attached as RBS Exhibit 210 is a true and correct copy of an email sent from Thomas Raby to Gerard Rainville on March 1, 2006, bearing production number FHFA00570105.

213. Attached as RBS Exhibit 211 is a true and correct copy of the Prospectus Supplement for Freddie Mac Structured Pass-Through Certificates, Series T-067, bearing production number FHFA00570345.

214. Attached as RBS Exhibit 212 is a true and correct copy of the Prospectus

Supplement for HarborView Mortgage Loan Trust 2006-CB1, bearing production number RBS-FHFA-CT-0013943.

215. Attached as RBS Exhibit 213 is a true and correct copy of an Excel spreadsheet bearing production number RBS-FHFA-CT-0430115.

216. Attached as RBS Exhibit 214 is a true and correct copy of an email sent from Greg Hair to Sally Williamson, Geraldine Idrizi, Andrea Bridgeman, and others on February 20, 2006, bearing production number RBS-FHFA-CT-0964230.

217. Attached as RBS Exhibit 215 is a true and correct copy of an email sent from Geraldine Idrizi on February 27, 2006, bearing production number RBS-FHFA-CT-5487552.

218. Attached as RBS Exhibit 216 is a true and correct copy of a spreadsheet bearing production number FHFA19005934.

219. Attached as RBS Exhibit 217 is a true and correct copy of Richard Schirtzer's October 4, 2014 Letter to Judge Cote.

220. Attached as RBS Exhibit 218 is a true and correct copy of a Monthly Subprime Business Report issued on November 26, 2007 by Fannie Mae, bearing production number FHFA00060518.

221. Attached as RBS Exhibit 219 is a true and correct copy of Freddie Mac's T-Deal Overview, dated August 3, 2009, bearing production number FHFA12469141.

222. Attached as RBS Exhibit 220 is a true and correct copy of Freddie Mac's Subprime Strategy Working Paper, dated January 2007, bearing production number FHFA02344966.

223. Attached as RBS Exhibit 221 is a true and correct copy of a Memorandum

by Fannie Mae regarding New Century Sub-prime Deal #14897, dated February 9, 2006, bearing production number FHFA00778813.

224. Attached as RBS Exhibit 222 is a true and correct copy of an excerpt from the Dissent from the Majority Report of the Financial Crisis Inquiry Commission.

225. Attached as RBS Exhibit 223 is a true and correct copy of a Memorandum by Fannie Mae regarding a Request for Concurrence – Sub Prime – Interim NBI, dated March 10, 2006, bearing production number FHFA01222815.

226. Attached as RBS Exhibit 224 is a true and correct copy of a due diligence proposal by Fannie Mae, dated May 2006, bearing production number FHFA01133885.

227. Attached as RBS Exhibit 225 is a true and correct copy of a spreadsheet produced by FHFA, bearing production number FHFA00004103.

228. Attached as RBS Exhibit 226 is a true and correct copy of an email sent from Cindy Workman to Maria Holman, Bruce Friedman, and others on July 20, 2006, bearing production number FHFA00016885.

229. Attached as RBS Exhibit 227 are true and correct copies of excerpts from the transcript of the deposition of John Ingram, taken on November 26, 2013.

230. Attached as RBS Exhibit 228 is a true and correct copy of a Fannie Mae New Business Initiative Temporary Approval: Interim Investor Channel Sub-Prime Acquisition Authority, dated March 15, 2006, bearing production number FHFA00311033.

231. Attached as RBS Exhibit 229 is a true and correct copy of a spreadsheet bearing production number ML-OPUS-00174095.

232. Attached as RBS Exhibit 230 is a true and correct copy of a presentation produced by FHFA, bearing production number FHFA01282610.

233. Attached as RBS Exhibit 231 is a true and correct copy of a Memorandum by Fannie Mae regarding New Century Sub-prime Deal #1489, dated February 9, 2006, bearing production number FHFA00778813.

234. Attached as RBS Exhibit 232 is a true and correct copy of a Freddie Mac Presentation regarding Option ARMS – Credit Risk Management Issues, dated March 21, 2006, bearing production number FHFA01105739.

235. Attached as RBS Exhibit 233 is a true and correct copy of a Freddie Mac Presentation regarding Due Diligence for Subprime Business, dated May 23, 2007, bearing production number FHFA01488778.

236. Attached as RBS Exhibit 234 is a true and correct copy of an October 20, 2006 Individual Asset Summary Report for WAMU T073, bearing production number FHFA02424524.

237. Attached as RBS Exhibit 235 is a true and correct copy of a November 1, 2007 Individual Asset Summary Report for Deutsche Bank 2007-09, bearing production number FHFA02475202.

238. Attached as RBS Exhibit 236 is a true and correct copy of a Fannie Mae Presentation on Single-Family Mortgage Business Sub-Prime Policy, dated August 2006, bearing production number FHFA01133772.

239. Attached as RBS Exhibit 237 is a true and correct copy of a Freddie Mac Presentation on Due Diligence for Subprime Business, dated May 23, 2007, bearing production number FHFA01488778.

240. Attached as RBS Exhibit 238 is a true and correct copy of a Moody's Investor Briefing, dated June 20, 2006, bearing production number FHFA00333705.

241. Attached as RBS Exhibit 239 is a true and correct copy of a Due Diligence Proposal by Fannie Mae, dated May 2006, bearing production number FHFA15920663.

242. Attached as RBS Exhibit 240 is a true and correct copy of a Freddie Mac Alternative Markets Operations Review of Union Bank of Switzerland Real Estate Securities Inc., dated July 11, 2006, bearing production number of FHFA03484454.

243. Attached as RBS Exhibit 241 is a true and correct copy of a Freddie Mac Alternative Markets Operations Review of Morgan Stanley Mortgage Capital, Inc., dated June 9, 2006, bearing production number FHFA03500858.

244. Attached as RBS Exhibit 242 is a true and correct copy of a Freddie Mac Alternative Markets Operations Review of Goldman Sachs, dated May 25, 2004, bearing production number FHFA11594612.

245. Attached as RBS Exhibit 243 is a true and correct copy of a Freddie Mac Alternative Markets Operations Review of Deutsche Bank (Conduit), dated June 29, 2005, bearing production number FHFA11597776.

246. Attached as RBS Exhibit 244 is a true and correct copy of a Freddie Mac Alternative Markets Operations Review of Goldman Sachs (Conduit), dated May 18, 2005, bearing production numbers FHFA11597798.

247. Attached as RBS Exhibit 245 is a true and correct copy of a Freddie Mac Alternative Markets Operations Review of Goldman Sachs, dated June 15, 2006, bearing production number FHFA03337751.

248. Attached as RBS Exhibit 246 is a true and correct copy of a Barclays Capital Presentation on Non-Traditional Lending Operational Review, dated November 2006, bearing production number FHFA01280256.

249. Attached as RBS Exhibit 247 is a true and correct copy of a Bear Stearns Presentation on Non-Traditional Lending Operational Review, dated October 2006, bearing production number FHFA01280267.

250. Attached as RBS Exhibit 248 is a true and correct copy of a Citigroup Presentation on Non-Traditional Lending Operational Review, dated November 2006, bearing production number FHFA01280280.

251. Attached as RBS Exhibit 249 is a true and correct copy of a J.P. Morgan Securities Presentation on Non-Traditional Lending Operational Review, dated October 2006, bearing production number FHFA01280305.

252. Attached as RBS Exhibit 250 is a true and correct copy of a Merrill Lynch Presentation on Non-Traditional Lending Operational Review, dated October 2006, bearing production number FHFA01280340.

253. Attached as RBS Exhibit 251 is a true and correct copy of a Morgan Stanley Presentation on Non-Traditional Lending Operational Review, dated October 2006, bearing production number FHFA01280352.

254. Attached as RBS Exhibit 252 is a true and correct copy of a UBS Presentation on Non-Traditional Lending Operational Review, dated October 2006, bearing production number FHFA01280419.

255. Attached as RBS Exhibit 253 is a true and correct copy of a Deutsche Bank Presentation on Non-Traditional Lending Operational Review, dated October 2006, bearing production number FHFA01281058.

256. Attached as RBS Exhibit 254 is a true and correct copy of a Bear Stearns / EMC Mortgage Corp. Presentation on Non-Traditional Lending Operational Review, dated

August 29, 2005, bearing production number FHFA13915853.

257. Attached as RBS Exhibit 255 is a true and correct copy of a Société Générale Presentation on Non-Traditional Lending Operational Review, dated December 2006, bearing production number FHFA14232678.

258. Attached as RBS Exhibit 256 is a true and correct copy of a Freddie Mac Alternative Markets Operations Review of Union Bank of Switzerland Real Estate Securities Inc., dated July 11, 2006, bearing production number FHFA12935980.

259. Attached as RBS Exhibit 257 is a true and correct copy of a UBS Presentation on Non-Traditional Lending Operational Review, dated October 2006, bearing production number FHFA19054466.

260. Attached as RBS Exhibit 258 is a true and correct copy of a Deutsche Bank Presentation on Non-Traditional Lending Operational Review, dated October 2006, bearing production number FHFA19054577.

261. Attached as RBS Exhibit 259 is a true and correct copy of a Morgan Stanley Presentation on Non-Traditional Lending Operational Review, dated October 2006, bearing production number FHFA19056412.

262. Attached as RBS Exhibit 260 is a true and correct copy of an email sent from Steve Herbert to Diane Fisher on February 13, 2004, bearing production number CLAY-FHFADEF-E-1235231, with an attachment bearing production number CLAY-FHFADEF-E-1235232.

263. Attached as RBS Exhibit 261 is a true and correct copy of an Excel spreadsheet entitled "Countrywide Operational Review," bearing production number FHFA11944274.

264. Attached as RBS Exhibit 262 is a true and correct copy of an Excel spreadsheet entitled "2006 Housing Goals Certification," bearing production number FHFA00777624.

265. Attached as RBS Exhibit 263 is a true and correct copy of an email sent from John Ingram to Patricia Jones on June 6, 2007, bearing production number FHFA01438952.

266. Attached as RBS Exhibit 264 is a true and correct copy of a Freddie Mac overview bearing production number FHFA02472794.

267. Attached as RBS Exhibit 265 is a true and correct copy of a Freddie Mac Presentation on Due Diligence for Subprime Business, dated May 23, 2007, bearing production number FHFA01488778.

268. Attached as RBS Exhibit 266 is a true and correct copy of a summary of a First Franklin Subprime Deal, bearing production number FHFA00275368.

269. Attached as RBS Exhibit 267 is a true and correct copy of a Freddie Mac summary of loan level due diligence, bearing production number FHFA00275377.

270. Attached as RBS Exhibit 268 is a true and correct copy of a Freddie Mac summary of a Chase Subprime Deal, bearing production number FHFA01440106.

271. Attached as RBS Exhibit 269 is a true and correct copy of an email sent from John Ingram to Patricia Jones on June 6, 2007, bearing production number FHFA01438952.

272. Attached as RBS Exhibit 270 is a true and correct copy of a Freddie Mac summary of Blemished Credit Bulk Transactions, bearing production number FHFA01133916.

273. Attached as RBS Exhibit 271 is a true and correct copy of a Freddie Mac

summary of a potential securitization purchase, bearing production number FHFA02481877.

274. Attached as RBS Exhibit 272 is a true and correct copy of a Wells Fargo Home Mortgage Due Diligence Review as of October 8, 2007, bearing production number FHFA02450160.

275. Attached as RBS Exhibit 273 is a true and correct copy of a Freddie Mac summary of a due diligence review, bearing production number FHFA02465054.

276. Attached as RBS Exhibit 274 is a true and correct copy of an email sent from Don Bisenius to Peter Bernet and Katy Kenny on October 16, 2007, bearing production number FHFA03345526.

277. Attached as RBS Exhibit 275 is a true and correct copy of a Fannie Mae Presentation on Nationstar Mortgage, LLC's Non-Traditional Counterparty Review, dated October 16-18, 2006, bearing production number FHFA01640417.

278. Attached as RBS Exhibit 276 is a true and correct copy of a Fannie Mae Presentation on First Franklin Financial Corporation and National City Home Loan Services, dated May 2006, bearing production number FHFA00775157.

279. Attached as RBS Exhibit 277 is a true and correct copy of a May 14, 2007 letter from Fannie Mae to Ameriquest/Argent Mortgage, bearing production number FHFA02404510.

280. Attached as RBS Exhibit 278 is a true and correct copy of the Prospectus Supplement for Freddie Mac Structured Pass-Through Certificates, Series T-072, bearing production number FHFACW117106515.

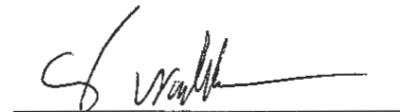
281. Attached as RBS Exhibit 279 is a true and correct copy of the Expert Report to Leonard A. Blum in Rebuttal to Expert Report of Charles Grice (July 9, 2014) Relating

to RBS Securities Inc., dated November 10, 2014.

282. Attached as RBS Exhibit 280 is a true and correct copy of an email sent from Ronald Feigles to Sally Baker and others on July 17, 2007, bearing production number FHFA02465041, with an attachment bearing production numbers FHFA02465380-02466466.

283. Attached as RBS Exhibit 281 are true and correct copies of excerpts from the transcript of Vicki Beal before the Financial Crisis Inquiry Commission, held on Septemebr 23, 2010.

Dated: December 2, 2014
New York, New York



Craig S. Waldman